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CompTel

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

September 13, 2001

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application of Verizon to Provide In-Region InterLATA Service in Pennsylvania, CC Docket No. 01-138

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on September 10, 2001 its representative met with Commission staff regarding the above referenced docket. Specifically, CompTel met with Matthew Brill, Legal Advisor to Commissioner Abernathy. During the meeting materials were distributed, copies of which are attached to this letter. Representing CompTel was the undersigned attorney.

Sincerely,

Jonathan Lee
Vice President,
Regulatory Affairs

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CompTel

September 7, 2001

Via Hand Delivery

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by Verizon Pennsylvania for Authorization to Provide In-Region InterLATA Services in Pennsylvania*, CC Docket No. 01-138

Dear Ms. Salas:

The Competitive Telecommunications Association ("CompTel"), on behalf of its member company Metropolitan Telecommunications ("MetTel"), submits this response to Verizon's August 17, 2001 *ex parte* letter.[1] Additionally, CompTel also provides evidence and statistical analyses that rebuts some of Verizon's more egregious claims.

In its August 17th letter, Verizon regrettably, but predictably, seeks to trivialize the very real competitive impact of the billing problems being experienced by carriers such as MetTel, Z-Tel, and WorldCom. While Verizon correctly notes that a BOC must provide billing information to competitive carriers in "'substantially the same time and manner that a BOC provides such information to itself,'"[2] Verizon fails to comprehend, or at the very least acknowledge, that there are costs to competitors, and competition, from receiving inferior quality billing information that far exceed the wholesale dollar amount in the carrier to carrier bill.

It is notable that Verizon, in its August 17th letter, did not address the many problems with the accuracy of various notices generated through the Verizon carrier to

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[1] *Application by Verizon Pennsylvania for Authorization to Provide In-Region InterLATA Services in Pennsylvania*, CC Docket No. 01-138, Letter from Dee May, Executive Director, Federal Regulatory, Verizon to Magalie Roman Salas, dated August 17, 2001 ["Verizon *ex parte*"].

[2] Verizon *ex parte* at 1 quoting the *Connecticut 271 Order, citations omitted.*

carrier OSS interfaces. These problems, while technically OSS problems, frequently manifest themselves as billing errors. MetTel has consistently raised these issues, both in Pennsylvania and in comments in this proceeding, without any rebuttal from Verizon.[3] Once again, through statistical analysis performed by MetTel, as well as evidence provided by MetTel, CompTel will demonstrate that the billing problems stemming from erroneous billing/provisioning completion notices continue to hinder competitors' ability to meaningfully compete in Pennsylvania. Furthermore, despite assurances to the contrary by Verizon, it is clear that the problem of "orphaned" accounts—not associated with a master account—remains a persistent problem, as does the issue of yellow pages charges being incorrectly billed to MetTel, rather than the consumer who purchased the advertisement.

I. Verizon's Bill Format Problems Existed When Verizon Filed This Application

In several instances in its August 17th submission, Verizon asserts that MetTel is "simply wrong" without providing meaningful evidence to support their position. For example, Verizon claims that MetTel's complaint regarding the BOS/BDT not being formatted in accordance with industry standards is inaccurate, as is MetTel's complaint that its electronic bill was not able to be electronically parsed. Verizon cites the fact that Pricewaterhouse Coopers, with whom Verizon no doubt worked closely, was able to open and parse Verizon bills, using an "off the shelf" software program.

With respect to this claim, it is helpful to note that the PwC auditors were working with only 110 accounts; which is not a meaningful approximation of "commercially reasonable" in a market that is truly "irreversibly open to competition." MetTel, too, may have been able to use Microsoft Access® to open its bill if it had a fairly low number of accounts. However, after a fairly early point in a carrier's growth, Microsoft Access® is simply unable to handle the volume of information required to read and analyze the Verizon electronic bill, and at the time of Verizon's present application, MetTel was unable to read or analyze Verizon's BOS/BDT using Access® or any other "off the shelf" program available to MetTel.

The simple fact that Verizon points to *only one* carrier that has successfully opened and parsed a BOS/BDT bill using an "off the shelf" software program confirms, rather than refutes, the existence of tape problems at the time of Verizon's present 271 filing.[4] It is instructive to note that MetTel has used BOS/BDT in New York without the types of problems that it encounters in Pennsylvania. The system that MetTel has developed to access and analyze these bills is built faithfully in accordance with Telcordia specifications. This program works for the New York bill. It did not work for the Pennsylvania bill at the time Verizon's present application was filed with the Commission.

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[3] *See generally*, CompTel July 5th ex parte (confidential version), CC Docket No. 01-138; CompTel Comments, filed July 11, 2001, at pp. 15-20.

[4] *Verizon ex parte* at 2.

It is important to note that when MetTel received the July billing tape, it attempted to open the tape using its New York/Pennslyvania program, to which no modifications were made, and the program was suddenly able to open and parse the July tape. Thus, because MetTel's program was unchanged, it is evident that Verizon must have made some modifications to its July BOS/BDT to allow the opening and parsing of invoices, while continuing to claim that the BOS/BDT was correct in its original incarnation. While there is not enough time remaining for MetTel to evaluate whether this problem has definitively been remedied within the context of this application, it is clear that Verizon continues to modify its electronic bill and that the electronic bill was, at the time of Verizon's filing, not in compliance with industry standards.

While Verizon seems to imply that competitors, like MetTel, purposely used the BOS/BDT problems as an excuse to not pay their wholesale bills,[5] Verizon's own conduct belies such an assertion. In its August 17th letter, Verizon suggests that competitors with legitimate billing disputes can, and should, identify specific areas of dispute either from analysis of their bills or a comparison with their own records.[6] Although MetTel will later explain why it is unrealistic to expect a competitor to construct an accurate account of what it owes Verizon, based on Verizon's inaccurate and incomplete billing completion notices and daily usage feed tapes, it is instructive to note that Verizon itself was unable to identify billing errors with any specificity at the time of its application.

During the pendancy of this current 271 application, Verizon sent MetTel unsigned and undated correspondence which explained that Verizon had somehow identified errant charges on MetTel's May 16th and June 16th BDTs.[7] The notices attempt to isolate the types of incorrect charges in the form of categories, but there is no attempt made to identify with specificity on which component accounts the erroneous charges were incurred. If such an identification were possible, Verizon would have certainly provided it, as it would have helped to prevent an erroneous and incorrect charge from being passed on to MetTel's own customer. However, as the Commission can clearly see, any such effort to identify the source of these errors was, if undertaken at all, clearly unsuccessful. The only rational explanation for a lack of specificity in identifying these erroneous charges is that Verizon, itself, could not read and analyze its own BDT at this time either.

However, Verizon's recalculated billing accuracy data, submitted as Attachment 3 to its August 17th *ex parte*, raises many more questions with respect to Verizon's billing capability and its general conduct in managing its wholesale relationships with its competitors. While Verizon suggests that competitors should have been developing "work arounds" to reconstruct an accurate wholesale bill and to, thereby, be able to dispute errors with specificity, it is significant that Verizon's own billing accuracy data

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[5] *Id.* at 4.

[6] *Id.*

[7] These notices are reproduced in Tab A to this *ex parte*.

reveals that Verizon's wholesale bills were grossly and disparately inaccurate. Competitors, during the time period leading up to the present application, received bills that were excessively inaccurate, by any standard, but especially when compared to the performance Verizon provided itself. In light of this discriminatory disparity in billing accuracy, the Commission should consider the question that, if Verizon knew its wholesale bills were inaccurate, why didn't Verizon initiate its own audits of these bills, and upon discovering errors, unilaterally apply credits to the bills of all wholesale customers?

Even if Verizon, could not provide competitors with account-specific information on the errors it discovered, there was nothing to prevent Verizon from unilaterally correcting system-wide errors brought to its attention by other carriers. Yet Verizon did no such thing, until this application was pending at the Commission, and then the credits were only for errors in the May and June bills. If Verizon was able to electronically audit its own bills, then it appears to have taken the position that, even though it knew errors in the wholesale bills were pervasive, unless wholesale customers identified a specific error to dispute, Verizon would not initiate unilateral corrections. If this were the case, then it would clearly demonstrate that Verizon conducts its wholesale relationships with competitors with a level of reckless disregard that is tantamount to intentional, predatory discrimination. Thus, viewing the evidence in the best light for Verizon, the Commission must conclude that, at the time of filing, Verizon's BOS/BDT could not be electronically opened, read, and parsed, and, therefore, did not accord competitive carriers a meaningful opportunity to compete.

II. The Problems of "Orphan" Accounts And Incorrect Directory Advertising Charges Continue to Persist

Verizon's August 17th letter claims that two categories of billing problems identified by competitors, "orphan accounts" and incorrect charges for directory advertising, have "virtually disappeared."[8] While it is unclear what Verizon means by "virtually disappeared," it is clear from MetTel's experience that the problems created by these errors continue to persist in a very real way. MetTel cannot verify whether these problems have been fixed on a going forward basis, because MetTel has ceased marketing to new customers in Pennsylvania—largely as the result of these problems. Also, contrary to Verizon's assertions, the problem of "orphaned" accounts was clearly not fixed in February of 2000, because MetTel experienced a very large number of these problems upon its entry into Pennsylvania in October of 2000.

The problem of individual customer accounts not associated with any "master" account—the so-called "orphan" problem—was, Verizon claims, remedied in February of 2000. Similarly, Verizon states, its two order process may have, at times, created "temporary 'orphans.'" However, Verizon also states that the two order process was eliminated in June of 2001, and that "Verizon has continued to run reports to identify and

[8] Verizon *ex parte* at 4 and 6.

then correct these accounts."[9] As a result, Verizon further claims, "these orphaned stand-alone accounts have virtually disappeared."[10] MetTel, however, continues to receive orphan account notices.[11]

The basic mechanics of the two order process is that the first order changes a customer's billing name and address to the new carrier's name and address, and the second order converts the customer's service to a competitors' service—either UNEs or resale. One of the problems that this can create is that, if the second order does not process correctly—for example, the competitive carrier, and not the end-user, will show up as the "customer" in other carriers' billing records. So, for another example, Verizon's yellow pages affiliate will list MetTel as the advertiser instead of the customer who purchased the yellow pages ad. Similarly, other carriers such as long distance companies or other CLECs may also have MetTel listed as the party to be billed in their billing records. Contrary to Verizon's assertions, it has not "cleaned up" the very large number of MetTel customer accounts where MetTel, and not the end-user, is listed as the billed end-user.

MetTel has identified 450 accounts where interexchange carriers ("IXCs") have listed MetTel as the responsible end-user billing party, and an additional 150 cases where other CLECs list MetTel as the end-user billing party.[12] Furthermore, as noted above, Verizon has clearly not yet even figured out how to resolve the problem when it receives this erroneous information for its yellow pages affiliate. At Tab B, CompTel provides several examples of correspondence that MetTel has received, as recently as June or July, from Verizon's yellow pages affiliate.[13] This is information that MetTel should have never received if Verizon had resolved this problem.

The competitive effects of this type of error are as significant as the frequency with which these problems occurred. When MetTel is listed as the end-user, the result is, at a minimum, hours of frustration for MetTel to correct the problem and aggravation on the part of the consumer, who has never experienced these problems before switching to a competitor. This is the case when the end-user can be identified. However, because

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[9] Verizon *ex parte* at 6.

[10] *Id.*

[11] At Tab C CompTel provides further examples of "orphaned accounts" that MetTel has continued to receive throughout the June/July/August time frame. Because these notices contained some customer information, CompTel has redacted these in their entirety.

[12] MetTel may experience this problem more than some other CLECs, because MetTel allows customers to purchase "*a la carte*" in addition to purchasing a bundled offering composed of MetTel local and MetTel long distance. MetTel only experiences this problem with respect to interexchange carriers when it is the local, but not long distance, provider. To the degree that other CLECs may primarily, or even exclusively, sell a bundled local/long distance service, these carriers are much less likely to have experienced this problem.

[13] Because these notices contain some customer information, CompTel has redacted them in their entirety.

most IXCs do not use the customer telephone number as a billing account number, MetTel cannot identify these end-users to correct the error. As a result, the customer does not receive a bill, and if the end-user does not inquire with its IXC about the problem, they will eventually be disconnected for non-payment of their bill.

Thus, it is easy to understand why these billing system errors have led to MetTel's Pennsylvania attrition rate being much higher than its attrition rate in New York. Moreover, the impact of this problem on a competitor's ability to meaningfully compete is simply not accurately captured through the wholesale billing dispute information, which Verizon provides. It is the type of these billing system errors, whether end-user service quality is affected, and the ultimate effect on the competitive carrier's customer base, that are properly considered in assessing the magnitude of these billing system errors, and not the actual amount of the wholesale charges in dispute; which will always understate the actual impact on a competitor's ability to meaningfully compete.

III. Inaccurate Billing and Provisioning Completion Notices Have Impaired MetTel's Ability to Meaningfully Compete in Pennsylvania

In the second paragraph of its August 17th letter, Verizon asserts that the billing issues raised by CLECs are "narrow" and do not "involve the billing information that CLECs need to obtain from Verizon ... in order to bill their customers."[14] This statement is false. In fact, as CompTel will show in this section and in the Appendix at Tab D, the billing issues under discussion are broad, pervasive and critical and have severe negative impact on CLECs' ability to bill their customers. Verizon suggests that the wholesale carrier bills are not needed for billing end-user customers and that instead, a CLEC should rely on its own records and on usage information provided by Verizon. Aside from ignoring that accurate wholesale bills are essential for a CLEC to understand its costs, and thus competitively price its services, Verizon also renders it impossible for a competitor to adequately determine its own receivables without an accurate wholesale bill as a check on its inaccurate DUF.

As an initial matter, CLEC customer records are compiled using "notifiers" transmitted by Verizon. MetTel has repeatedly demonstrated that these notifiers are not reliable.[15] Verizon has never fully addressed the issue of dubious notifiers, and does not attempt to do so in its August 17th letter, except to object to an illustrative example of these problems that used a New York customer.[16] It is true that MetTel has raised certain claims that other CLECs have not. This is because, after struggling with incomplete, inaccurate, and often incomprehensible Verizon information, MetTel chose to expend a great deal of time, energy, and resources to develop methods for independently verifying Verizon's performance. MetTel's analyses continues to demonstrate that Verizon's provisioning and billing completion notices ("PCNs" or

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[14] Verizon *ex parte* at 1.

[15] *See generally*, CompTel July 5, 2001 *ex parte*; CompTel Comments, filed July 11, 2001, pp. 17-19.

[16] Verizon *ex parte* at 11.

"BCNs") are generally unreliable, and have actually become less accurate, even as timeliness has improved. The lack of accurate notifiers prevents MetTel from accurately assessing lines and services, and billing accordingly.[17]

For this same reason, Verizon's assertions that it is possible to bill based upon usage records are likewise inaccurate.[18] Usage records are also frequently inaccurate. Specifically, the data that leads MetTel to conclude that BCNs are frequently erroneously issued is a comparison of BCNs to the daily usage file ("DUF") records. If MetTel has received a BCN stating that a line has been provisioned to MetTel, then Verizon should be, correspondingly, reporting usage for the line. If a line shows no usage after MetTel has received a BCN for the line, then it is logical to conclude that the BCN was improperly issued. Thus, lines without usage cannot be accurately billed, because either the BCN was wrong and the customer has not been cut over to MetTel, or the customer was converted to MetTel and the usage information is not accurately being captured and recorded.

Many times, however, the source of the incorrect information, *i.e.,* incorrect PCN/BCN or null usage information, is not so easy to discern. As was noted above, Verizon does not forward usage records for every line for which MetTel has received a PCN or BCN. In many cases, MetTel has yet to see usage on lines that converted from flat rated calling plans on Verizon's system to the MetTel UNE platform. Because Verizon did not bill these end users for usage on their own platform, Verizon does not forward the usage to MetTel. Verizon incorrectly believes that it does not need to forward usage records for this line. In this case, in the absence of any usage to which MetTel is entitled, MetTel is unable to bill accurately. This is because, as a check on Verizon's inaccurate notifiers, MetTel's own internal billing system does not initiate a bill for a customer until the line shows usage. MetTel was forced to develop this business policy in the wake of Verizon's errant BCN information in order to prevent MetTel from wrongly billing a customer who was not cut over to MetTel, either at all, or on the date stated in the Verizon BCN. However, when Verizon provides tardy usage information on a line which does not correspond to the date on which the line was supposedly cut over the MetTel, MetTel loses the ability to bill for the missing time period. As is explained in greater detail in the following section, errors of this sort occur in approximately 14% of all cases, and 2% of the time, MetTel never receives usage information for lines on which a BCN has been received.

Thus, the simple existence of a call record in and of itself does not provide complete information from which to bill an end user. While Verizon may boast that "in the first six months of this year alone Verizon has provided more than *half a billion* call

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[17] MetTel has compiled additional data illustrating the accuracy problems with which competitive carriers must contend if they are to use Verizon's notifications, along with the DUF, as the basis for constructing bills for their own end-users. This data is provided at Tab D, and summarized in discussed in Section IV, *infra.*

[18] Verizon *ex parte*, pp. 1-4, generally.

records to CLECs...," [19] the number of call records is irrelevant. What is important is the accuracy and timeliness and completeness of these records. Given the poor performance of Verizon in providing both timely and accurate notifiers and usage records, MetTel finds that it *must* have an accurate wholesale bill so that it can have a third method for determining proper end-user charges.

IV. Statistical Confirmation That Verizon's Inaccurate OSS Information Compounds Customer-Affecting Problems Associated With Verizon's Poor Wholesale Billing

Attached to this letter, at Tab D, CompTel has included charts, prepared by MetTel, that statistically describe, and confirm, the problems described in the previous section, which render it impossible for competitors to realistically rely on nothing but Verizon's DUF to create their own retail bills. As we have explained in this letter, and Verizon does not rebut in its August 17th letter, Verizon's failure, either through an inability or lack of motivation, to improve the quality of its OSS-related account information, has eliminated any meaningful opportunity to compete for MetTel and other competitive carriers. However, CompTel recognizes that the charts at Tab D, while instructive, may be somewhat difficult to understand. Accordingly, we summarize and explain some of this information below.

Provisioning Completion Notice Completion Date to Notifier Receipt

This chart tracks the number of days between the completion date within a particular notifier and the date the notifier is received. From an operations perspective, the shorter the period the better it is to deal with customer issues since the CLEC is aware of the status of the account. The chart highlights the fact that MetTel receives only

- 87.8% of Provisioning Completion Notices within 2 days of the alleged completion of the work
- 76.3% of Billing Completion Notices within 2 days of the alleged completion of the work
- 80.41% of Billing Completion Notices within 3 days of the alleged completion of the work

The minimum level of acceptability—95%--is achieved 28 days after the completion date for PCNs and 22 days for BCNs The impact of these delayed responses results in the inability to service the customer. Without a BCN, (and, regrettably, sometimes even with a BCN), it is never clear whether a particular end user has become a MetTel customer. The practical effect of the delayed notifier is that a customer can easily miss a billing cycle. Then, a month later, after the "paperwork" has caught up to reality, the customer receives a double bill, which increases customer dissatisfaction, complaints and confusion. In addition, these delayed responses require CLECs to have trouble ticket

[19] Verizon *ex parte* at 1.

departments that are tenfold the size that they would be if Verizon was performing on a commercially viable level.

Analysis of Difference Between the Completion Date on the Provisioning Completion Notice and the Completion Date on the Billing Completion Notice

In an effort to determine when Verizon was actually provisioning MetTel's requests, MetTel began comparing the completion date with a PCN against the completion date within the BCN. Through March of 2001, MetTel's analysis demonstrated that the notifier completion dates were the same 83.73% of the time. While MetTel was examining this significant discrepancy to determine whether it reflected a particular type of problem, or whether it was yet another indication of inappropriate reporting, Verizon unilaterally modified the source of the completion date within a PCN. The net result is that the PCN completion date and the BCN completion date are now almost never the same—the BCN and PCN dates are consistent less than 3% of the time. The purpose of this change was, quite possibly, to conceal the significant discrepancies that are the root of many problems.

Trouble Ticket Status: November 2000 through May 2001
And
Analysis of Missing Completion Notifiers Provided After 3 Business Days from TT Initiation

These charts highlight the critical point that Verizon consistently fails to assist CLECs in resolving their problems in a timely fashion. Moreover, in most cases, any aid provided is fundamentally meaningless, as it fails to resolve the problem for which a trouble ticket was opened. As the Commission can see, Verizon takes more than 3 business days to resolve a trouble ticket over 76% of the time. Pathetically, over 97% of the responses are ineffective—in that they do not address the purpose for which the trouble ticket was opened. In short, Verizon has apparently taken the position that it will only feign assistance for its own measurement purposes. This is unfortunate, because MetTel has identified, with a strong correlation, a 300% increase in customer attrition when a trouble ticket is opened for a particular service order.

Migration Quality Analysis
Suspension for Non Payment Quality Analysis
Restoral Quality Analysis
PIC Change Quality – November 2000 to May 2001 Analysis

These charts demonstrate that, notwithstanding the fact that Verizon has issued a BCN (which is supposed to be the final notifier indicating that the work was not only performed (which is really reflected by a PCN), but that in fact that all of their systems, including billing, have recorded the work as being performed), *no* work was actually performed. In other words, Verizon appears to have designed a process that allows it to claim that it has met its performance metrics, while leaving the CLECs to figure out which orders are truly completed.

For example, the only way that a CLEC could know whether and when a UNE-P migration takes place is based on the receipt of usage. Accordingly, MetTel designed a system to compare PCN completion dates to a customer's recorded usage. In Pennsylvania, close to 12% of all migrations do not show usage three days after the PCN completion date. Close to 7% still do not show usage 7 days after the PCN completion date and, as of July 5, 2001, 2.24% of MetTel's migrations have never showed any usage whatsoever. Consequently, this migration analysis suggests that close to 14% of the migration notifiers depict that work was performed when it was not.

Likewise, MetTel performs a similar analysis with accounts that require suspension of service. Under this analysis, MetTel looks for usage two days after Verizon claims to have performed the work in its PCN and MetTel has never submitted an order for the restoral of service. In this scenario, framed in the best light for Verizon, the evidence demonstrates that over 12% of the orders that are allegedly completed are *never* actually ever performed because usage is continuous post suspension. Unlike the migration analysis, this analysis relies on the existence of something, rather than the absence of something, and, thus, is unequivocal.

Similarly, MetTel's PIC Change Quality analysis also demonstrates a similar pattern of non-performance in the wake of errant Verizon completion notices. In this analysis, MetTel tracks calls routed to IXCs after they submit PIC change requests and receive BCNs. As reflected in the chart, 17% of the calls routed to an IXC after the completion date of a PCN are routed to a presubscribed carrier other than the presubscribed carrier indicated on the BCN. Again, this illustrates that Verizon's performance is well below its reported performance in any performance plan.

Individually, and even more so in the aggregate, it is apparent that Verizon's failure to perform work in a timely, quality manner has been the source of major struggles for competitive carriers in Pennsylvania. Many of these issues have been raised with Verizon beginning in January of 2000, and again in this proceeding. To date, Verizon has not done anything to address these issues. Rather, through either inability or intransigence, Verizon has steadfastly failed to improve its OSS performance. Verizon, by its conduct, seems to believe that the Commission will not reject a Section 271 application on the basis of several "small" failures—regardless of whether the cumulative effect of these "small" failures has been to foreclose mass market competition by UNE-P based competitors.

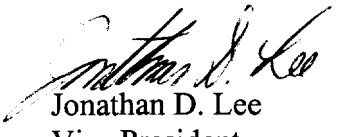
* * *

Verizon must not be permitted to continue its substandard performance by claiming that each individual component of a checklist item is not by itself critical. If these were, as Verizon would have the Commission believe, minor and narrow problems, small carriers like MetTel would not be wasting their limited resources quibbling over

details. As CompTel has demonstrated in this letter, and in prior submissions, there are still pervasive, billing-affecting inadequacies within Verizon's OSS. Similarly, because these problems still exist within Verizon's system, and continue to constrain competitors' ability to compete, it is clear that no concrete action has, of yet, been taken to eliminate these problems.

These "details," are not mere fine points, but spell the difference between being able to vigorously compete or being slowly consumed by all the "insignificant details" of Verizon's shoddy practices only to eventually go out of business. As the Commission well knows, the true scope and severity of any customer-affecting failure is not the amount or number of CLEC-ILEC disputes. Rather, for competitors, the consequence is frequently the loss of the entire retail account and the prospective loss of many more customers due to negative word of mouth. Thus, the Commission must, once and for all, determine that serious performance standards must be strictly enforced. Further, the Commission must conclusively affirm that RBOCs cannot receive 271 authority unless *each single item* on the competitive checklist is fully satisfied *at the time the application is filed.* Finally, under no circumstances must an RBOC be permitted to substitute promises of future performance or "system fixes" in lieu of actual, demonstrated present performance.

Sincerely,



Jonathan D. Lee
Vice President,
Regulatory Affairs

cc: B. Olson
S. Pie
R. Tanner
T. Hanbury

PA PON Completion Date to Receipt of Notifier Analyses: October 2000 Through May 2001

I. Provisioning Completion Notice Completion Date To Notifier Receipt

Type of Notifier	Received Status	1 Business Day	2 Business Days	3 Business Days	Never Received	Number of Days to reach 95%	Number of Days to reach 97%
PCN	Received	86.42%	87.80%		1.05%	28	30
BCN	Received		65.75%	72.58%	0.16% (1)	31	46

(1) Additionally, 0.58% of PONs never rececieved a PCN and no alternative means existed to determine the PCN CD
(2) Based on extensive discussions with Verizon operations staff, PCN's should be expected no later than the 2nd day after Provisioning Completion and BCNs should follow 1 day later

II. Billing Completion Notice Completion Date To Notifier Receipt

Type of Notifier	Received Status	Same Day	2 Business Days	3 Business Days	Never Received	Number of Days to reach 95%	Number of Days to reach 97%
BCN	Received	30.00%	76.30%	80.41%	0.16%	22	35

The Pennsylvania Standard in Metric OR-4 is 97% within two (2) Hours of SOP Completion

Analysis of the Difference Between the Completion Date on the Provisioning Completion Notice and the Completion Date on the Billing Completion Notice

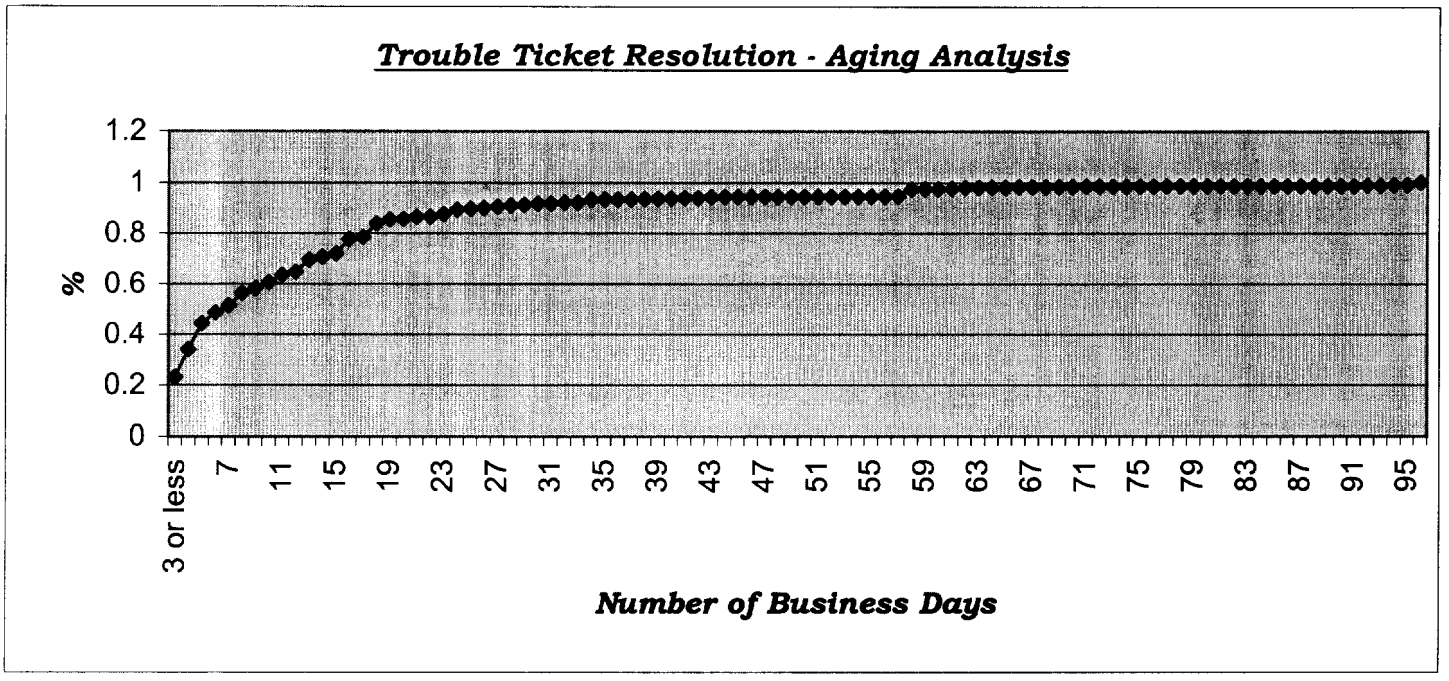
	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01
Correlation	92.70%	53.37%	66.20%	77.86%	95.18%	0.00%	3.33%	3.44%
Least Days Variation (1)	-75	0	0	0	0	0	-9	0
Most Days Variation	119	39	52	47	36	12	22	10

(1) Negative numbers indicate that the Billing Completion Notice Completion Date was prior to the Provisioning
(2) The LSOG 4 definitions for the DTM 198 data field in both the Provisioning and Billing Completion Notices read

Trouble Ticket Status : November 2000 through May 2001

As Of - 7/8/2001

Resolution of Pons on Trouble Tickets	Solved in 3 Business Days	Solved in More Than 3 Business Days	Not Solved	Total not Solved in 3 Business Days
	23.04%	76.09%	0.87%	76.96%



Analysis of Missing Completion Notifiers (BCN,PCN) Provided After 3 Business Days From TT Initiation(1)For The Months November 2000 Through May 2001

As of 7/6/2001

Answers provided by Verizon to TT	Requested Notifier	Percentage of Requested Notifier	Number of Items where FOC CDD is Prior to TT Opening	Number of Items where Completion Date is Prior to the Opening of theTT	Number of Items on PCD Report	Remarks
BUSFLOW (Confirmation	PCN	4.62%	100.00%	94.44%	0.00%	
	BCN	3.78%	100.00%	100.00%	0.00%	
CONFIRMED (LSRC Issued)	PCN	22.82%	100.00%	87.64%	0.00%	
	BCN	14.22%	100.00%	89.06%	0.00%	
JEOPARDY (Completion Delayed)	PCN	0.00%	N/A	N/A	N/A	No items were in this category
	BCN	1.56%	100.00%	100.00%	0.00%	For 6 of these pons, the Verizon response was provided after the PCN was already received
PROVNOT (Provisioning Completed and Notice Issued)	PCN	1.79%	100.00%	100.00%	0.00%	Verizon averaged 9 Days to reflow notifiers which they admitted were due!
	BCN	64.22%	100.00%	100.00%	0.00%	
COMPNOT (Billing Completed and Notice Issued)	PCN	68.97%	100.00%	99.63%	0.00%	
	BCN	15.11%	100.00%	100.00%	0.00%	Verizon averaged 19 Days to reflow notifiers which they admitted were due!
No Answer Provided	PCN	1.79%	100.00%	100.00%	0.00%	
	BCN	1.11%	100.00%	100.00%	0.00%	
Total			100.00%	97.62%	0.00%	

(1) Data is presented for PONs that have received at least one Completion Notifier

Migration Quality Analysis

As of July 5, 2001

Period	Account Usage Commencing After 3 Days from the PCN CD	Account Usage Commencing 7 or More Days from the PCN CD	No Usage as of July 5, 2001	Total Late and no Usage
Nov 00-May 01	**11.77%**	**6.71%**	**2.24%**	**14.01%**

Suspension for Non Payment (SNP) Quality Analysis

As of July 5, 2001

Period	Usage After the SNP PCN CD and Prior to the Restoral PCN CD	Usage After the SNP PCN CD with no Restoration of Service			Total (1)	
	%	%	% items on Loss of Line Report Prior to first Usage	Net %	%	Net %
Nov 00 - May 01	18.92%	12.21%	1.54%	10.67%	31.13%	29.59%

(1) The difference between the % and Net % columns represents the deduction of lines reported on the Verizon Loss of Lines Report. The Loss of Lines Report presents those lines which have migrated from MetTel to another carrier

Restoral Quality Analysis

As of July 5, 2001

	Usage commencing 3 or more days from the PCN CD restoring service	No Usage As Of July 5, 2001			Total No or Late Usage	
Period	%	%	% items Disconnected 7 Days or less from PCN CD	Net %	%	Net %
Nov 00-May 01	22.82%	28.86%	2.46%	26.40%	51.68%	49.22%

PIC Change Quality - November 2000 to May 2001 Analysis

Category	First CIC as 5237 (3)	Designated CIC Not as Requested (4)																		No CIC Record
		CARRIER 1	CARRIER 2	CARRIER 3	CARRIER 4	CARRIER 5	CARRIER 6	CARRIER 7	CARRIER 8	CARRIER 9	CARRIER 10	CARRIER 11	CARRIER 12	CARRIER 13	CARRIER 14	CARRIER 15	CARRIER 16	CARRIER 17	CARRIER 18	%	%
		%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%		
First CIC after PIC Change	48.6%	0.1%	0.3%	0.2%	4.7%	6.5%	0.6%	0.9%	1.7%	0.1%	0.5%	0.2%	0.1%	0.1%	0.1%	0.1%	0.4%	0.1%	0.3%	17.0%	34.4%

(1) CIC List other then Requested Contains 18 Carriers
(2) Usage Data from November through May Category 11
(3) Reflects % of calls correctly and appropriately routed to the predesignated carrier indicated on the Billing Completion Notifier
(4) Reflects the % of calls routed to a predesignated carrrier other than the one indicated on the Billing Completion Notifier